AMENDMENTS TO THE DRAWINGS

Please substitute the attached Replacement Sheet of Figure 2 (i.e., sheet 2/5) for the sheet

in the application as filed. The Replacement Sheet adds reference numerals 28' and 29', which

were inadvertently omitted from the originally-filed drawing sheet. Applicant respectfully and

affirmatively submits that no new matter would be added by entry of these amendments to

Figure 2 and that these amendments are fully supported by the specification at least at paragraphs

[0037] and [0038].

In addition, please substitute the attached Replacement Sheet of Figures 5a-5d (i.e., sheet

5/5) for the sheet in the application as filed. The Replacement Sheet adds reference numeral 47

to Figure 5a, which was inadvertently omitted from the originally-filed drawing sheet. Applicant

respectfully and affirmatively submits that no new matter would be added by entry of this

amendment to Figure 5a and that this amendment is fully supported by the specification at least

at paragraph [0057].

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REMARKS

I. Summary of the Office Action

In the Office Action mailed October 1, 2010, the Examiner (i) objected to the drawings under 37 C.F.R. §§ 1.84(p)(5) and 1.83(a), (ii) objected to the specification under MPEP § 608.01(a) and 37 C.F.R. § 1.77(c), (iii) objected to claims 13 and 17 as lacking antecedent basis, (iv) rejected claims 9-15, 17, 18, and 20 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,823,793 (Dewitte), and (v) rejected claim 16 under 35 U.S.C. § 103(a) as being obvious over Dewitte.

II. Status of the Claims/Response to Objections to the Claims

Now pending and under examination are claims 9-12, 14-18, and 20, among which only claim 9 is independent. Applicant has amended claim 9 to now recite, *inter alia*, that "at least one camera is placed for sensing a position of the printing plate in the vicinity of a desired final position of the printing plate, wherein the at least one camera is located independent from the manipulator." Support for this amendment can be found throughout the specification, including, for example, paragraph [0010] and Figure 2. Applicant has also amended claims 10, 11, and 16. Applicant submits that no new matter has been added.

As noted above, the Examiner objected to claims 13 and 17 as lacking antecedent basis. Applicant respectfully submits that the objection to claim 13 is moot in light of Applicant cancelling claim 13. Further, Applicant submits that the objection to claim 17 is moot in light of Applicant amending claim 9 because claim 9 now recites "a desired final position", which provides antecedent basis for "the desired final position", as recited by claim 17.

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III. Status of the Specification/Response to Objections to the Specification

As noted above, Applicant has amended paragraph [0031] to remove the recitation of reference numeral 6 and has amended paragraph [0055] to remove the recitation of reference numeral 42.

Applicant has also amended the specification to include the appropriate section headings as set forth in 37 C.F.R. § 1.77(c). (Please see the Amendments to the Specification section above for details regarding these amendments). Therefore, Applicant respectfully requests that the objections to the specification for lacking the appropriate section headings be withdrawn.

Further, Applicant has (i) amended paragraph [0031] to add the language "of FIG.", as suggested by the Examiner, (ii) amended paragraph [0032] by changing two instances of "10a, 10b" to "10A, 10B" for consistency with the drawings, as suggested by the Examiner, and (iii) amended paragraph [0033] to replace reference numeral 18 with reference 19 to correct a typographical error, as suggested by the Examiner. Therefore, Applicant respectfully requests that the objections to the specification addressing these three issues be withdrawn.

Please note that Applicant did not make any changes to page 7, line 30 of the specification of the application as filed because corresponding paragraph [0036] of the specification of the application as published as U.S. Patent Application Publication No. 2007/0261580 already recites the word "whether" instead of the misspelled word "wether".

IV. Status of the Drawings/Response to Objections to the Drawings

Applicant has amended (i) Figure 2 to add reference numerals 28' and 29' and (ii) Figure 5a to add reference numeral 47. (Please see the Amendments to the Drawings section above for details regarding these amendments.) In view of these amendments, Applicant respectfully

MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP 300 SOUTH WACKER DRIVE CHICAGO, ILLINOIS 60606 TELEPHONE (312) 913-0001 requests that the Examiner's objection to the drawings based on the omission of these reference numerals be withdrawn.

Applicant also respectfully requests that the Examiner's objection to the drawings based on the omission of reference numeral 6 in the drawings be withdrawn because Applicant has amended paragraph [0031] of the specification to remove the recitation of reference numeral 6.

Additionally, Applicant respectfully requests that the Examiner's objection to the drawings based on the omission of reference numeral 42 in the drawings also be withdrawn because Applicant has amended paragraph [0055] to remove the recitation of reference numeral 42 and replace it with the text "(not shown)" because the apertures are not depicted in the drawings.

As noted above, Applicant has amended claims 10 and 16. In light of these amendments, Applicant respectfully requests that the Examiner's objection to the drawings under 37 C.F.R. § 1.83(a) be withdrawn.

V. Response to the Claim Rejections

As noted above, the Examiner (i) rejected claims 9-15, 17, 18, and 20 under 35 U.S.C. § 102(e) as being anticipated by Dewitte and (ii) rejected claim 16 under 35 U.S.C. § 103(a) as being obvious over Dewitte. Of these claims, claim 9 is independent.

Applicant submits that the rejections of claims 9-18 and 20 are moot in light of the amendments to the claims noted above. Further, Applicant submits that claims 9-12, 14-18, and 20 patentably distinguish over the Dewitte reference. At a minimum, the Dewitte reference does not disclose a device for positioning a printing plate on a carrier, where at least one camera is located independent from [a] manipulator that is used for transporting the printing plate on the carrier, as recited by claim 9.

MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP 300 SOUTH WACKER DRIVE CHICAGO, ILLINOIS 60606 TELEPHONE (312) 913-0001 At best, Dewitte discloses an apparatus for mounting printing plate segments on a carrier that utilizes one or more pick-up arms to manipulate and mount the printing plate segments on the carrier, where a video camera is included in each of the one or more pick-up arms. *See*, *e.g.*, Column 2, lines 56-63 ("The head [of each arm] includes a video camera"); Column 4, lines 29-38 ("The apparatus further includes a video detection system that in one embodiment includes a video camera on each pick-up arm."); Column 5, lines 15-18 ("[T]he video cameras . . . of the pick-up arms"); Column 12, lines 43-49 ("One embodiment includes a video camera mounted in each pick-up arm."); Figure 3. Accordingly, it is clear that Dewitt does not disclose at least one camera being located independent from the manipulator, as recited by claim 9.

Moreover, Dewitte does not disclose a device for positioning a printing plate on a carrier, "wherein [a] control means is adapted to control the transportation of the printing plate, independent of [an] image displayed by the at least one camera, from [a] table to the field of vision of the at least one camera." At best, at Column 2, lines 47-49, Dewitte discloses that the apparatus controls the transportation of the printing plate segments by using one or more pick-up arms to carry the printing plate segments "via a path determined using the detected position on the table and the final position," where the detected position is obtained using the video camera of each of the one or more pick-up arms. In other words, Dewitte discloses that the apparatus' control of the transportation of the printing plate segments, from the table to the final position, is dependent on the position detected by the one or more video cameras. This is nearly in direct contradiction to the claim features noted above. Further, because Dewitte discloses that a video camera is included in each of the one or more pick-up arms, the printing plate segments are within the "field of vision" of the video cameras from the beginning of their transportation by the pick-up arms. For at least these reasons, Applicant respectfully submits that Dewitte does not

MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP 300 SOUTH WACKER DRIVE CHICAGO, ILLINOIS 60606 TELEPHONE (312) 913-0001 disclose that "the control means is adapted to control the transportation of the printing plate,

independent of the image displayed by the at least one camera, from the table to a field of vision

of the at least one camera," as recited by claim 9.

In light of the foregoing, Applicant submits that claim 9 is allowable. Further, Applicant

submits that claims 10-12, 14-18, and 20 are allowable as well for at least the reason that they

each depend from allowable claim 9. Applicant therefore respectfully requests favorable

reconsideration and allowance of the claims. Applicant does not acquiesce in any assertion by

the Examiner that is not expressly addressed in these remarks. Should the Examiner wish to

discuss this case with the undersigned, the Examiner is welcome to call the undersigned at 312-

By:

913-3367.

Respectfully submitted,

McDonnell Boehnen

HULBERT AND BERGHOFF LLP

Date: January 3, 2011

/John Dan Smith/

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